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EX PARTE OR LATE FILED

May 4, 1998

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: Ex Parte Presentation in CC Docket No. 97-231; CC Docket No. 97-121; CC Docket No. 97-208; CC Docket No. 97-137

Dear Ms. Salas:

On Monday, May 4, 1998, I submitted the attached presentation on 911 issues to David Kirschner of the Policy Division.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules. Due to the lateness of the hour, this Notice was not filed until the day after the meeting.

Sincerely,

Susan Jin Davis

Attachment

cc: Michael Pryor
Carol Mattey
Melissa Newman
David Kirschner

911 and E911 Services

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MCI Telecommunications Corporation

May 4, 1998

The Act's Requirements

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- Section 271(c)(2)(B)(vii)(I): RBOCs must provide nondiscriminatory access to 911 and E911 services:
  - Equal manner of access to 911 and E911 as RBOC
  - Same accuracy and reliability that RBOC provides its own customers
    - Populate E911 database with competitor and user data
    - Perform error correction for competitors on a nondiscriminatory basis
  - Dedicated trunks to 911 control office at parity
  - Access to 911 database at parity

  See Ameritech Michigan Order, paragraphs 256-279

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Importance

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- Public Safety necessitates accurate, reliable 911/E911 system

- Without nondiscriminatory access, CLECs will not be able to provide the E911/911 services at the same quality level as the RBOCs

- CLECs will not be able to compete as either a resale or facilities-based provider without the ability to provide equal quality of this life saving checklist item

- "It is critical that RBOCs provide new entrants with accurate and nondiscriminatory access to 911/E911 services so that customers subscribing to services provided by new entrants are able to reach emergency assistance." *See Overview of Common Carrier Bureau Staff Summaries, March 30, 1998, Letter from Chairman Kennard to Senators McCain and Brownback, Attachment A*

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Nondiscriminatory Access - Resale

Issue: Resale - "Migrate as is"

- Billing change to migrate customer to MCI resale
  - Change to E911/911 databases is not required
- RBOCs overlay information into the database, requiring reentry of information, with no effective system to ensure integrity
- Even if RBOC does not overlay information, the RBOC must perform reconciliations to ensure new entries and E911 changes are processed accurately

MCI Non-Discriminatory Access - Resale - Cont.

If Process for Re-entry of Data is Adopted the Following are Necessary:

- System must be automated
- No unnecessary codes or other procedures permitted
- RBOC must perform full address validation in the initial, up-front edits. Orders should be rejected to the CLEC if the address is not 100% accurate, with a detailed error notice
- RBOC must perform reconciliations that verify the effectiveness of the E911 CLEC process. ILEC shares these results with CLECs

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Non-Discriminatory Access - Facilities Based

- Adequate systems required to process UNE listings, e.g., ability to unlock records

- Redundant and diverse routing needed, as recommended by the National Emergency Number Association (NENA), to assure CLEC customers have access to 911 service if primary 911 path fails

- RBOC must send record level confirmations back to CLEC, as recommended by the NENA

- CLEC must be provided the ability to view the Automatic Location Identification (ALI) database in order verify records are input correctly

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MCI Non-Discriminatory Access - Facilities Based, Cont.

- Database dump of ALI so CLECs can reconcile their databases with the ALI database
- RBOC must have a process in place to ensure proper notification and coordination with CLEC when moving 911 tandems from one switch to another
- RBOC must perform reconciliations that verify the effectiveness of the E911 CLEC process. RBOC must share these results with CLECs

Bell Atlantic

- **BA is requiring TAR and EXCH code fields on the automated feed in certain states**
  - Historically BA has not required these codes which have no real technical purpose
  - The codes create unnecessary and burdensome procedures on CLECs for verification and routing:
    - BA can change the codes and CLEC records will be incorrect
    - Different requirements by state make the process unmanageable
    - TAR and EXCH codes are inconsistent by region
    - Systematically impossible to determine customer exchange, and therefor the code, for 10% of the population in a region

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Bell Atlantic - Cont.

- Due to the inability to use an automated system, as a result of the code requirement, CLECs must rely on manual processes which increase the likelihood of errors in database

  - Data must be manually written on BA specified forms

  - BA manually enters the information into the system

  - Conditional posting process compares the record against the Master Street Address Guide (MSAG)

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Bell Atlantic - Cont.

- Lack of integrity of database
  - No confirmation that BA received the data
  - No confirmation that BA input the data
  - Even if error is detected, information is still entered into the database by BA
  - BA is not consistently sending the error notices to MCI or its vendor
  - BA does not allow MCI to view the database to verify information and offers no acceptable means to audit

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Bell Atlantic - Cont.

- In New York, BA failed to cooperate with MCI when moving 911 tandems from one switch to another
  - BA moved trunks MCI customers' E911 calls travel over, without coordinating with MCI
  - BA failed to verify the new switch, to which the trunks were moved, was in service
  - The result was an E911 service outage
  - BA continues to delay appointing a single point of contact and clear escalation procedures

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Pacific Bell

- PB Requires Unnecessary Process for Listing Resale Customers in Database

  - Process required for 911/E911 database update is unnecessary for resale

    - Requires overlay of information for "migrate as is" orders

      - CLECs subjected to insufficient process to include CLEC customers in 911/E911 database

    - Creates an unnecessary cost and risk to the customers

  - Timing for database update is not sufficient

    - Does not synchronize the completion of the Service Order with the population of the new E911 listing

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Pacific Bell - Cont.

- **PacBell does not provide for integrity of the database**
  - OSS does not provide for sufficient validation or upfront edits
  - PacBell's system is ineffective for verifying that the database contains accurate information
    - Process for reconciling the ALI information for CLECs against the service address on the customer account is only done weekly,
      - Potentially resulting in a 7-10 day delay from the Service Order Completion before the data is corrected
    - MCI has experienced instances of corrections taking much longer than a week, and instances of multiple corrections

Pacific Bell - Cont.

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– PacBell hinders CLECs ability to verify the accuracy of the data

- E911 Dial Up software does not allow CLECs to see the listing until 3-5 days after it has been updated
- PB does not provide reporting of reconciliation results to CLECs

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Pacific Bell - Cont.

- Inadequate systems for processing UNE listings
  - ALI is not sophisticated enough to unlock records at the ANI level. Since ALI shows PB as the LEC of record, MCI's listings reject
- No Positive Confirmation of E911 listings
  - Has not supported process of record level confirmations of E911 listings
  - Current process is to detail the rejects and provide only a count of the total number of confirmations of E911 listings

Southwestern Bell

- Access to SWBT's MSAG delayed
    - MCI sought to obtain electronic access to the master street address guide (MSAG) so it could pre-validate addresses
    - SWBT delayed responding to MCI's request for over 60 days in spite of testimony that SWBT provides MSAG to all CLECs
- Does not provide for integrity of the database
    - SWBT system does not correct the errors it detects on MCI customers' 911 records
    - Does not verify accuracy of 911 information
    - Does not permit MCI access to database to verify information

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MCI Southwestern Bell - Cont.

- Redundancy and Diversity
  - Although SWBT now claims diverse routing has always been available to CLECs, and at TELRIC price for unbundled dedicated transport
    - SWBT initially asserted compliance with MCI's request for 911 redundancy and diversity is within SWBT's discretion
    - SWBT initially asserted that the parties must negotiate the pricing of the redundant and diverse trunks, notwithstanding an arbitrated price for 911 trunks
  - SBC provides diverse and redundant routing for itself *See SWB witness Deere's testimony at the Texas PUC's 271 hearing, April 23, volume 4, page 1099*

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Southwestern Bell - Cont.

- Failed to give MCI proper notification when moving 911 tandems from one switch to another
  - Notified MCI the same day that they were moving tandems to another switch
  - This was insufficient time to allow MCI to test the facilities

USWest

Lack of integrity of database
- No confirmation that USW received the data
- No confirmation that USW input the data
- USW does not allow MCI to view system to verify information and no acceptable means to audit

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Ameritech

- Failed to give MCI proper notification when moving 911 tandems from one switch to another
  - MCI learned of change by accident, but too late
  - AIT knew MCI was not ready and still proceeded without notifying MCI
  - This resulted in MCI customers not being provided E911/911 service
  - One customer was delayed emergency care

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Ameritech - Cont.

- Lack of integrity of Database
  - AIT does not provide MCI access to 911 database in order to verify accuracy

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BellSouth

BST failed to give MCI proper notification when moving 911 tandems from one switch to another

- Resulted in MCI having less than a week notice to place the required orders